

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRAINTREE HOSPITAL LLC)	
d/b/a Northeast Specialty Hospital)	
of Braintree,)	
)	
Plaintiff,)	CIVIL ACTION
)	NO. 04-12136REK
vs.)	
)	
VIRGINIA SULLIVAN, JOHN SULLIVAN,)	
and PLUMBER’S UNION, LOCAL NO. 12)	
)	
Defendants.)	

MOTION (*ASSENTED TO*) BY DEFENDANT PLUMBER’S UNION, LOCAL NO. 12
FOR ENLARGEMENT OF TIME IN WHICH TO FILE RESPONSIVE PLEADING

The Defendant Plumbers’s Union, Local No. 12 (“Plumber’s 12”) hereby moves the Court, with the assent of the Plaintiff and the other defendant, for an enlargement of time until and through December 1, 2004 in which to file a responsive pleading to the Plaintiff’s Complaint. As grounds for the requested enlargement of time, Defendant’s counsel states that Plaintiff’s counsel has represented to him that Plaintiff will be dismissing Plumber’s 12 from this action either through amendment of his Complaint or by filing a voluntary notice of dismissal which would obviate the need for Plumber’s 12 to file a responsive pleading. In the event Plaintiff fails to follow through on such representation, Plumber’s 12 will file its responsive pleading by December 1, 2004. The extension of time to file is assented to by Plaintiff. This Motion is supported by the Affidavit of David W. Healey.

WHEREFORE, Defendant Plumber’s 12 requests that the Court grant an enlargement of time until and through December 1, 2004 in which to file its responsive pleading.

Respectfully submitted,

PLUMBER'S UNION, LOCAL NO. 12,

By its attorney,

/s/David W. Healey

David W. Healey (BBO# 548262)

DAVID W. HEALEY & ASSOCIATES

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